

EXHIBIT 9

DECLARATION OF PLAINTIFF FELIPE DE JESUS SUAREZ-PALAFIX

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

_____)	
FELIPE DE JESUS AVILA-SOTO, et al.)	
)	Case No. 6:24-cv-01392
Plaintiffs,)	
)	JUDGE ROBERT R. SUMMERHAYS
v.)	
)	MAGISTRATE JUDGE CAROL B.
)	WHITEHURST
SOUTH CENTRAL SUGAR CANE)	
GROWERS' ASSOCIATION, INC., et al.)	
)	
Defendants.)	
_____)	

DECLARATION OF FELIPE DE JESUS SUAREZ-PALAFox

1. My name is Felipe de Jesus Suarez-Palafox. I am one of the Plaintiffs in this case.
2. My permanent residence is in Mexico. I have worked for the Defendants with an H-2A temporary work visa as a truck driver during each sugarcane harvest season between 2022 and 2025. I also worked in prior years as an H-2A truck driver for a prior company that was also associated with the Sterling Sugars' mill.
3. During each of the sugarcane harvest seasons between 2022 and 2025 I work for the Defendants as a truck driver operating a tractor-trailer truck to haul sugarcane from fields to the Sterling Sugars mill. I have not had any other job responsibilities with the Defendants other than to perform work as a truck driver between 2022 and 2025.
4. Between 2022 and 2025 there were many of us from Mexico with H-2A visas who do the same job as me—driving trucks to haul sugarcane to the mill. Myself and many of the other truck drivers from Mexico stay in an old motel near the mill and pick up our trucks each day at the truck yard.

5. Between 2022 and 2025 I worked more than 40 hours during most of the weeks that I worked for the Defendants as a truck driver. I have never received any overtime pay when I worked more than 40 hours in a week, including during the current 2025 season. Attached to this declaration are copies of some of the paycheck stubs that I received that show I did not receive overtime pay when I worked more than 40 hours in a week, including one from the current 2025 season.

6. My co-workers who came from Mexico with H-2A visas and also worked as truck drivers between 2022 and 2025 also did not receive overtime pay. I know this because we lived together and would sometimes talk about how we were paid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on _____

Felipe de Jesus Suarez-Palafox

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC				Employee Name: FELIPE D SUAREZ PALAFOX		SSN #:	
Employee ID: 5076						Check #: 3046	
Pay period : 10/01/25 to : 10/14/25							
		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Type	Dollars		
Gross	2102.15	Reg	141.75	FWT	61.75	MEALS	-196.00
Other	0.00	OT1	0.00	OASDI	0.00	AR EMP	-100.00
Tips	0.00	OT2	0.00	MED	0.00		
Cash Tips	0.00	Vac	0.00	SWT	35.25		
		Sick	0.00	SDI	0.00		
Subtotal	2102.15	Hol	0.00	SUI	0.00		
Dir Dep	-1709.15	Comm	0.00				
Taxes	-97.00	Misc	0.00				
Deducts	-296.00	Other	0.00				
Net Pay	0.00						
		Gross Pay	2102.15	Total Tax	97.00		
Year-to-Date:		Gross	5016.06	Vacation: Earned	0.00	Direct	1709.15
FWT	116.18	SWT	80.78	Taken	0.00	Deposit	
OASDI	0.00	SDI	0.00				
MED	0.00	SUI	0.00				

3046

***** Zero & 00/100 Dollars

10/20/2025

*****0.00

FELIPE D SUAREZ PALAFOX

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 2395

Pay period : 12/28/22 to : 01/10/23		Earnings		Taxes		Deductions & Other Pays
		Type	Hours Dollars	Type	Dollars	
Gross	2278.41	Reg	171.00	FWT	98.37	MEALS -196.00
Other	0.00	OT1	0.00	OASDI	0.00	
Tips	0.00	OT2	0.00	MED	0.00	
Cash Tips	0.00	Vac	0.00	SWT	55.34	
		Sick	0.00	SDI	0.00	
		Hol	0.00	SUI	0.00	
		Comm				
Subtotal	2278.41	Misc				
Taxes	-153.71	Other				
Deducts	-196.00					
Net Pay	1928.70	Gross Pay	2278.41	Total Tax	153.71	

Year-to-Date: Gross 4310.87 FWT 168.92 MED 0.00
Pay Rate: 13.670 OASDI 0.00 SWT 102.07

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #:

Check #: 2227

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 12/14/22 to : 12/27/22		Earnings		Taxes		Deductions & Other Pays
		Type	Hours Dollars	Type	Dollars	
Gross	2032.46	Reg	163.25	FWT	70.55	MEALS -196.00
Other	0.00	OT1	0.00	OASDI	0.00	
Tips	0.00	OT2	0.00	MED	0.00	
Cash Tips	0.00	Vac	0.00	SWT	46.73	
		Sick	0.00	SDI	0.00	
		Hol	0.00	SUI	0.00	
		Comm				
Subtotal	2032.46	Misc				
Taxes	-117.28	Other				
Deducts	-196.00					
Net Pay	1719.18	Gross Pay	2032.46	Total Tax	117.28	

Year-to-Date: Gross 2032.46 FWT 70.55 MED 0.00
Pay Rate: 12.450 OASDI 0.00 SWT 46.73

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 1692

Pay period : 11/02/22 to : 11/15/22		Earnings		Taxes		Deductions & Other Pays
		Type	Hours Dollars	Type	Dollars	
Gross	2144.51	Reg	172.25	FWT	82.30	MEALS -196.00
Other	0.00	OT1	0.00	OASDI	0.00	
Tips	0.00	OT2	0.00	MED	0.00	
Cash Tips	0.00	Vac	0.00	SWT	50.65	
		Sick	0.00	SDI	0.00	
		Hol	0.00	SUI	0.00	
		Comm				
Subtotal	2144.51	Misc				
Taxes	-132.95	Other				
Deducts	-196.00					
Net Pay	1815.56	Gross Pay	2144.51	Total Tax	132.95	

Year-to-Date: Gross 6919.09 FWT 263.72 MED 0.00
Pay Rate: 12.450 OASDI 0.00 SWT 156.86

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

AVILA-SOTO_PL_00174

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 3035

Pay period : 11/30/22 to : 12/13/22		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	1799.03	Reg	144.50	1799.03	FWT	47.21	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	38.56	
		Sick	0.00		SDI	0.00	
Subtotal	1799.03	Hol	0.00		SUI	0.00	
		Comm					
Taxes	-85.77	Misc					
Deducts	-196.00	Other					
Net Pay	1517.26	Gross Pay		1799.03	Total Tax	85.77	

Year-to-Date: Gross 10719.46 FWT 378.37 MED 0.00
Pay Rate: 12.450 OASDI 0.00 SWT 241.06

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

CHECK NUMBER

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #:

Check #: 1512

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 10/19/22 to : 11/01/22		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	2175.64	Reg	174.75	2175.64	FWT	86.04	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	51.74	
		Sick	0.00		SDI	0.00	
Subtotal	2175.64	Hol	0.00		SUI	0.00	
		Comm					
Taxes	-137.78	Misc					
Deducts	-196.00	Other					
Net Pay	1841.86	Gross Pay		2175.64	Total Tax	137.78	

Year-to-Date: Gross 4774.58 FWT 181.42 MED 0.00
Pay Rate: 12.450 OASDI 0.00 SWT 106.21

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

CHECK NUMBER

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #:

Check #: 1219

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 10/05/22 to : 10/18/22		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	2253.45	Reg	181.00	2253.45	FWT	95.38	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	STORES -100.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	54.47	
		Sick	0.00		SDI	0.00	
Subtotal	2253.45	Hol	0.00		SUI	0.00	
		Comm					
Taxes	-149.85	Misc					
Deducts	-296.00	Other					
Net Pay	1807.60	Gross Pay		2253.45	Total Tax	149.85	

Year-to-Date: Gross 2598.94 FWT 95.38 MED 0.00
Pay Rate: 12.450 OASDI 0.00 SWT 54.47

Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 592

Pay period : 11/01/23 to : 11/14/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	3282.93	Reg	141.75	3282.93	FWT	209.49	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	90.50	
		Sick	0.00		SDI	0.00	
Subtotal	3282.93	Hol	0.00		SUI	0.00	
Dir Dep	-2786.94	Comm					
Taxes	-299.99	Misc					
Deducts	-196.00	Other					
Net Pay	0.00	Gross Pay		3282.93	Total Tax	299.99	

Year-to-Date: Gross 17093.63 Vacation: Earned 0.00 Direct [REDACTED] 2798.54
 FWT 641.23 SWT 383.60 Taken 0.00 Deposit

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 23

Pay period : 10/04/23 to : 10/17/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	1855.70	Reg	135.75	1855.70	FWT	45.95	MEALS -168.00
Other	0.00	OT1	0.00		OASDI	0.00	STORES -100.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	40.55	
		Sick	0.00		SDI	0.00	
Subtotal	1855.70	Hol	0.00		SUI	0.00	
Dir Dep	-1501.20	Comm					
Taxes	-86.50	Misc					
Deducts	-268.00	Other					
Net Pay	0.00	Gross Pay		1855.70	Total Tax	86.50	

Year-to-Date: Gross 8058.34 Vacation: Earned 0.00 Direct [REDACTED] 1501.20
 Taken 0.00 Deposit

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 749

Pay period : 11/15/23 to : 11/28/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	3537.69	Reg	152.75	3537.69	FWT	240.06	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	99.42	
		Sick	0.00		SDI	0.00	
Subtotal	3537.69	Hol	0.00		SUI	0.00	
Dir Dep	-3002.21	Comm					
Taxes	-339.48	Misc					
Deducts	-196.00	Other					
Net Pay	0.00	Gross Pay		3537.69	Total Tax	339.48	

Year-to-Date: Gross 20631.32 Vacation: Earned 0.00 Direct [REDACTED] 3002.21
 FWT 994.29 SWT 492.02 Taken 0.00 Deposit

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 313

Pay period : 10/18/23 to : 10/31/23		Earnings		Taxes		Deductions & Other Pays
		Type	Hours	Dollars	Type	Dollars
Gross	2912.37	Reg	125.75	2912.37	FWT	165.02
Other	0.00	OT1	0.00		OASDI	0.00
Tips	0.00	OT2	0.00		MED	0.00
Cash Tips	0.00	Vac	0.00		SWT	77.53
		Sick	0.00		SDI	0.00
		Hol	0.00		SUI	0.00
Subtotal	2912.37	Comm				
Dir Dep	-2473.82	Misc				
Taxes	-242.55	Other				
Deducts	-196.00					
Net Pay	0.00	Gross Pay		2912.37	Total Tax	242.55

Year-to-Date: Gross 13393.82 Vacation: Earned 0.00 Direct [REDACTED] 2473.82
FWT 431.74 SWT 293.10 Taken 0.00 Deposit

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 2583

Pay period : 01/11/23 to : 01/24/23		Earnings		Taxes		Deductions & Other Pays
		Type	Hours	Dollars	Type	Dollars
Gross	1845.45	Reg	135.00	1845.45	FWT	51.85
Other	0.00	OT1	0.00		OASDI	0.00
Tips	0.00	OT2	0.00		MED	0.00
Cash Tips	0.00	Vac	0.00		SWT	40.19
		Sick	0.00		SDI	0.00
		Hol	0.00		SUI	0.00
Subtotal	1845.45	Comm				
Taxes	-92.04	Misc				
Deducts	-154.00	Other				
Net Pay	1599.41	Gross Pay		1845.45	Total Tax	92.04

Year-to-Date: Gross 6156.32 FWT 220.77 MED 0.00
Pay Rate: 13.670 OASDI 0.00 SWT 142.26 Federal Tax ID: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 1088

Pay period : 12/13/23 to : 12/26/23		Earnings		Taxes		Deductions & Other Pays
		Type	Hours	Dollars	Type	Dollars
Gross	3740.34	Reg	161.50	3740.34	FWT	264.38
Other	0.00	OT1	0.00		OASDI	0.00
Tips	0.00	OT2	0.00		MED	0.00
Cash Tips	0.00	Vac	0.00		SWT	106.51
		Sick	0.00		SDI	0.00
		Hol	0.00		SUI	0.00
Subtotal	3740.34	Comm				
Dir Dep	-3173.45	Misc				
Taxes	-370.89	Other				
Deducts	-196.00					
Net Pay	0.00	Gross Pay		3740.34	Total Tax	370.89

Year-to-Date: Gross 28413.08 Vacation: Earned 0.00 Direct [REDACTED] 3173.45
FWT 1446.18 SWT 708.04 Taken 0.00 Deposit
OASDI 0.00 SDI 0.00

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 916

Pay period : 11/29/23 to : 12/12/23		Earnings		Taxes		Deductions & Other Pays
		Type	Hours	Dollars	Type	Dollars
Gross	4041.42	Reg	174.50	4041.42	FWT	300.51
Other	0.00	OT1	0.00		OASDI	0.00
Tips	0.00	OT2	0.00		MED	0.00
Cash Tips	0.00	Vac	0.00		SWT	118.51
		Sick	0.00		SDI	0.00
		Hol	0.00		SUI	0.00
Subtotal	4041.42	Comm				
Dir Dep	-3426.40	Misc				
Taxes	-419.02	Other				
Deducts	-196.00					
Net Pay	0.00	Gross Pay		4041.42	Total Tax	419.02

Year-to-Date: Gross 24672.74 Vacation: Earned 0.00 Direct [REDACTED]

AVILA-SOTO_PL_00177

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5076

Employee Name: FELIPE D SUAREZ PALAFOX

SSN #:

Check #: 1872

Pay period : 11/16/22 to : 11/29/22		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	2001.34	Reg	160.75	2001.34	FWT	67.44	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	45.64	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
Subtotal	2001.34	Comm					
Taxes	-113.08	Misc					
Deducts	-196.00	Other					
Net Pay	1692.26	Gross Pay		2001.34	Total Tax	113.08	

Year-to-Date: Gross 8920.43 FWT 331.16 MED 0.00 Federal Tax ID: [REDACTED]
Pay Rate: 12.450 OASDI 0.00 SWT 202.50

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SSN #:

Check #: 2895

Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX				Check #: 2695	
Pay period : 10/04/23 to : 10/17/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	1288.27	Reg	0.00	0.00	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	20.69	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
Subtotal	1288.27	Comm					
Dir Dep	-1267.58	Misc		1288.27			
Taxes	-20.69	Other					
Deducts	0.00						
Net Pay	0.00	Gross Pay		1288.27	Total Tax	20.69	

Year-to-Date: Gross 9346.61 FWT 266.72 MED 0.00 Federal Tax ID: [REDACTED]
Pay Rate: 23.160 OASDI 0.00 SWT 203.50

CHECK NUMBER

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

SSN #:

Check #: 2756

Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX				Check #: 2756	
Pay period : 09/20/23 to : 10/03/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	46.32	Reg	2.00	46.32	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	0.00	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
Subtotal	46.32	Misc					
Taxes	0.00	Other					
Deducts	0.00						
Net Pay	46.32	Gross Pay		46.32	Total Tax	0.00	

Year-to-Date: Gross 6202.64 FWT 220.77 MED 0.00 Federal Tax ID: [REDACTED]
Pay Rate: 23.160 OASDI 0.00 SWT 142.26

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 10/02/24 to : 10/15/24		Check #: 1576			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	192.75	FWT	361.19
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	142.78
		Sick	0.00	SDI	0.00
		Hol	0.00	SUI	0.00
Subtotal		Comm			
Dir Dep		Misc			
Taxes		Other			
Deducts					
Net Pay					
Gross Pay			4612.51	Total Tax	503.97
Year-to-Date: Gross 9631.28 Vacation: Earned 0.00 Direct [REDACTED] 3912.54					
FWT 587.53 SWT 269.63 Taken 0.00 Deposit [REDACTED]					
OASDI 0.00 SDI 0.00					

Pay period : 09/18/24 to : 10/01/24		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours Dollars	Type	Dollars		
Gross		Reg	96.25	FWT	84.94	MEALS	
Other		OT1	0.00	OASDI	0.00	STORES	
Tips		OT2	0.00	MED	0.00		
Cash Tips		Vac	0.00	SWT	56.21		
		Sick	0.00	SDI	0.00		
		Hol	0.00	SUI	0.00		
Subtotal		Comm					
Dir Dep		Misc					
Taxes		Other					
Deducts							
Net Pay							
Gross Pay			2303.26	Total Tax	141.15		
Year-to-Date: Gross 5018.77 Vacation: Earned 0.00 Direct [REDACTED] 1950.11							
FWT 126.85 Taken 0.00 Deposit [REDACTED]							

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 10/18/23 to : 10/31/23		Check #: 313			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	125.75	FWT	165.02
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	77.53
		Sick	0.00	SDI	0.00
		Hol	0.00	SUI	0.00
Subtotal		Comm			
Dir Dep		Misc			
Taxes		Other			
Deducts					
Net Pay					
Gross Pay			2912.37	Total Tax	242.55
Year-to-Date: Gross 13393.82 Vacation: Earned 0.00 Direct [REDACTED] 2473.82					
FWT 431.74 SWT 293.10 Taken 0.00 Deposit [REDACTED]					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 11/13/24 to : 11/26/24		Check #: 2131			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	147.75	FWT	231.97
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	99.34
		Hol	0.00	SDI	0.00
		Comm		SUI	0.00
Subtotal		Misc			
Dir Dep		Other			
Taxes					
Deducts					
Net Pay					
Gross Pay			3535.66	Total Tax	331.31
Year-to-Date: Gross 21560.39 Pay Rate: 23.160 Direct [REDACTED] 3008.35					
FWT 1442.10 SWT 619.19 Deposit [REDACTED]					
OASDI 0.00 SDI 0.00					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 11/29/23 to : 12/12/23		Check #: 916			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	174.50	FWT	300.51
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	118.51
		Sick	0.00	SDI	0.00
		Hol	0.00	SUI	0.00
Subtotal		Comm			
Dir Dep		Misc			
Taxes		Other			
Deducts					
Net Pay					
Gross Pay			4041.42	Total Tax	419.02
Year-to-Date: Gross 24672.74 Vacation: Earned 0.00 Direct [REDACTED] 3426.40					
FWT 1181.80 SWT 601.53 Taken 0.00 Deposit [REDACTED]					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 11/27/24 to : 12/10/24		Check #: 2316			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	161.00	FWT	270.02
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	110.49
		Hol	0.00	SDI	0.00
		Comm		SUI	0.00
Subtotal		Misc			
Dir Dep		Other			
Taxes					
Deducts					
Net Pay					
Gross Pay			3852.73	Total Tax	380.51
Year-to-Date: Gross 25413.12 Pay Rate: 23.160 Direct [REDACTED] 3276.22					
FWT 1712.12 SWT 729.68 Deposit [REDACTED]					
OASDI 0.00 SDI 0.00					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 10/04/23 to : 10/17/23		Check #: 23			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	135.75	FWT	45.95
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	40.55
		Sick	0.00	SDI	0.00
		Hol	0.00	SUI	0.00
Subtotal		Comm			
Dir Dep		Misc			
Taxes		Other			
Deducts					
Net Pay					
Gross Pay			1855.70	Total Tax	86.50
Year-to-Date: Gross 8058.34 Vacation: Earned 0.00 Direct [REDACTED] 1501.20					
FWT 1501.20 Taken 0.00 Deposit [REDACTED]					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 12/11/24 to : 12/24/24		Check #: 2501			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	162.00	FWT	272.89
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	111.51
		Hol	0.00	SDI	0.00
		Comm		SUI	0.00
Subtotal		Misc			
Dir Dep		Other			
Taxes					
Deducts					
Net Pay					
Gross Pay			3876.66	Total Tax	384.40
Year-to-Date: Gross 29289.78 Pay Rate: 23.160 Direct [REDACTED] 3296.26					
FWT 3296.26 Taken 0.00 Deposit [REDACTED]					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC					
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		SSN #: [REDACTED]	
Pay period : 11/15/23 to : 11/28/23		Check #: 749			
		Earnings		Taxes	
		Type	Hours Dollars	Type	Dollars
Gross		Reg	152.75	FWT	240.06
Other		OT1	0.00	OASDI	0.00
Tips		OT2	0.00	MED	0.00
Cash Tips		Vac	0.00	SWT	99.42
		Sick	0.00	SDI	0.00
		Hol	0.00	SUI	0.00
Subtotal		Comm			
Dir Dep		Misc			
Taxes		Other			
Deducts					
Net Pay					
Gross Pay			3537.69	Total Tax	339.48
Year-to-Date: Gross 20631.32 Vacation: Earned 0.00 Direct [REDACTED] 3002.21					
FWT 493.02 Taken 0.00 Deposit [REDACTED]					

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC				SSN #:			
Employee ID: 5076		Employee Name: FELIPE D SUAREZ PALAFOX		Check #: 1760			
Pay period : 10/16/24 to : 10/29/24		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	4480.89	Reg	187.25	4480.89	FWT	345.40	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-196.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	137.19	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
Subtotal	4480.89	Comm					
Dir Dep	-3802.30	Misc					
Taxes	-482.59	Other					
Deducts	-196.00						
Net Pay	0.00	Gross Pay		4480.89	Total Tax	482.59	
Year-to-Date:		Gross	14112.17	Vacation:	Earned	0.00	Direct
					Taken	0.00	Deposit
FWT	932.93	SWT	406.82				
OASDI	0.00	SDI	0.00				3802.30

Employee ID: 5076 Employee Name: FELIPE D SUAREZ PALAFOX SSN #: [REDACTED] Check #: 2395

Pay period : 12/28/22 to : 01/10/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	2278.41	Reg	171.00	2278.41	FWT	98.37	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	55.34	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
		Misc					
		Other					
Subtotal	2278.41	Gross Pay		2278.41	Total Tax	153.71	
Taxes	-153.71						
Deducts	-196.00						
Net Pay	1928.70						

Year-to-Date: Gross 4310.87 FWT 168.92 MED 0.00
13.670 OASDI 0.00 SWT 102.07 Federal Tax ID: [REDACTED]
Pay Rate: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC. CHECK NUMBER [REDACTED]

Employee ID: 5076 Employee Name: FELIPE D SUAREZ PALAFOX SSN #: [REDACTED] Check #: 2756

Pay period : 09/20/23 to : 10/03/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	46.32	Reg	2.00	46.32	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	0.00	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
		Misc					
		Other					
Subtotal	46.32	Gross Pay		46.32	Total Tax	0.00	
Taxes	0.00						
Deducts	0.00						
Net Pay	46.32						

Year-to-Date: Gross 6202.64 FWT 220.77 MED 0.00
23.160 OASDI 0.00 SWT 142.26 Federal Tax ID: [REDACTED]
Pay Rate: [REDACTED]

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

Employee ID: 5076 Employee Name: FELIPE D SUAREZ PALAFOX SSN #: [REDACTED] Check #: 2895

Pay period : 10/04/23 to : 10/17/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	1288.27	Reg	0.00	0.00	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	20.69	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
		Misc		1288.27			
		Other					
Subtotal	1288.27	Gross Pay		1288.27	Total Tax	20.69	
Dir Dep	-1267.58						
Taxes	-20.69						
Deducts	0.00						
Net Pay	0.00						

Year-to-Date: Gross 9346.61 FWT 266.72 MED 0.00
23.160 OASDI 0.00 SWT 203.50 Federal Tax ID: [REDACTED]
Pay Rate: [REDACTED]

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC SSN #: [REDACTED] Check #: 452

Employee ID: 5076 Employee Name: FELIPE D SUAREZ PALAFOX

Pay period : 11/03/23 to : 11/16/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	416.88	Reg	18.00	416.88	FWT	0.00	
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	0.00	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
		Misc					
		Other					
Subtotal	416.88	Gross Pay		416.88	Total Tax	0.00	
Dir Dep	-416.88						
Taxes	0.00						
Deducts	0.00						
Net Pay	0.00						

Year-to-Date: Gross 13810.70 Vacation: Earned 0.00 Direct [REDACTED] 416.88
FWT 431.74 SWT 293.10 Taken 0.00 Deposit
OASDI 0.00 SDI 0.00
MED 0.00 SUI 0.00

SOUTH CENTRAL SUGAR CANE GROWERS ASSOC SSN #: [REDACTED] Check #: 592

Employee ID: 5076 Employee Name: FELIPE D SUAREZ PALAFOX


Pay period : 11/01/23 to : 11/14/23		Earnings		Taxes		Deductions & Other Pays	
		Type	Hours	Dollars	Type	Dollars	
Gross	3282.93	Reg	141.75	3282.93	FWT	209.49	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	90.50	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
		Misc					
		Other					
Subtotal	3282.93	Gross Pay		3282.93	Total Tax	299.99	
Dir Dep	-2786.94						
Taxes	-299.99						
Deducts	-196.00						
Net Pay	0.00						

Year-to-Date: Gross 17093.63 Vacation: Earned 0.00 Direct [REDACTED] 2786.94
FWT 641.23 SWT 383.60 Taken 0.00 Deposit

Declaration of Translation

I, Carlos Radillo, declare that I am a certified Federal and State Court translator and I am fluent in both the English and Spanish languages. I have reviewed the attached Spanish Declarations of Felipe de Jesus Suarez Palafox and Felipe de Jesus Avila Soto and the English translations and I certify that the translations are true and correct.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on November 14, 2025.



Signature

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

FELIPE DE JESUS AVILA-SOTO, et al.)	
Plaintiffs,)	Case No. 6:24-cv-01392
v.)	JUDGE ROBERT R. SUMMERHAYS
SOUTH CENTRAL SUGAR CANE)	MAGISTRATE JUDGE CAROL B.
GROWERS ASSOCIATION, INC., et al.)	WHITEHURST
Defendants.)	

DECLARACIÓN DE FELIPE DE JESÚS SUÁREZ-PALAFOX

1. Mi nombre es Felipe de Jesús Suárez-Palafox. Soy uno de los demandantes en este caso.
2. Mi residencia permanente está en México. He trabajado para los demandados con una visa de trabajo temporal H-2A como conductor de camión durante cada temporada de cosecha de caña de azúcar entre 2022 y 2025. También trabajé en años anteriores como conductor de camion con visa H-2A para una empresa que también estaba asociada con la molina de Sterling Sugars.
3. Durante cada una de las temporadas de cosecha de caña de azúcar entre 2022 y 2025, trabajo para los demandados como camionero que opera un camión con remolque para transportar caña de azúcar desde los campos hasta el molino Sterling Sugars. No he tenido ninguna otra responsabilidad laboral con los Demandados aparte de trabajar como conductor de camión entre 2022 y 2025.
4. Entre 2022 y 2025, muchos de nosotros de México con visas H-2A hacemos el mismo trabajo que yo: conducir camiones para transportar caña de azúcar al molino. Yo y

muchos otros camioneros mexicanos nos alojamos en un viejo motel cerca de la molina y recogemos nuestros camiones cada día en el depósito de camiones.

5. Entre 2022 y 2025 trabajé más de 40 horas durante la mayoría de las semanas que trabajé para los demandados como camionero. Nunca he recibido ningún pago por horas extras cuando trabajé más de 40 horas en una semana, incluso durante la temporada actual de 2025. Adjunto a esta declaración hay copias de algunos de los talones de cheque de pago que recibí que muestran que no recibí pago de horas extras cuando trabajé más de 40 horas a la semana, incluido uno de la temporada actual de 2025.

6. Mis compañeros de trabajo que vinieron de México con visas H-2A y también trabajaron como camioneros entre 2022 y 2025 tampoco recibieron pago de horas extras. Lo sé porque vivíamos juntos y a veces hablábamos de cómo nos pagaban.

Declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto a mi leal saber y entender.

Ejecutado el 5-NOV-2025


Felipe de Jesus Suarez Palafox